March 13, 2000

The Honorable James E. Hall
Chairman, NTSB
490 L’Enfant Plaza East, SW
Washington, DC 20594

Dear Mr. Chairman:

As the Executive Director of the Aerospace Medical Association (AsMA), the membership of which comprises predominantly physicians engaged in the practice of aviation medicine, I am offering you our thoughts on NTSB letter (A-00-4 through - 6) dated January 13, 2000. I have attached p. 14 of the NTSB letter with the 3 recommendations that I will address in order.

1) Recommendation # 1 - As you undoubtedly know, the FAA Office of Aviation Medicine already has procedures to grant special issuances in such cases. Hence, this recommendation is unnecessary. However, we would strongly urge the FAA to fund the Office of Aviation Medicine to conduct research on the effect of medications on pilot performance.

2) Recommendation # 2 - AsMA strongly opposes the publication of lists of specific medications with their side effects. This would be very difficult in that new medications are always under consideration making it logistically infeasible to regularly and frequently update the list. Furthermore, it is impractical to describe the many side effects of so many medications as well as their interactions with another drug. Such a list could also be dangerous in that it is usually the underlying condition rather than the medication that is paramount in aeromedical disposition. In short, it is neither feasible nor appropriate to assemble a list of medications and their side effects for distribution to aircrew.

3) AsMA supports recommendation # 3 - Establishing and implementing educational programs targeting pilots and disseminating information that would describe the effects of various classes (not specific drugs) of medication would be beneficial. This initiative should include
over-the-counter medication as well as herbals.

I hope you find these remarks useful and if I can be of any further service, please don't hesitate to call me. Thank you.

Sincerely,

Russell B. Rayman M.D.

Russell B. Rayman, M.D.
Executive

cc: The Honorable Rodney E. Slater
    The Honorable Jane F. Garvey